

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

UMG RECORDINGS, INC., *et al.*,

Plaintiffs,

v.

KURBANOV, *et al.*,

Defendants.

Case No. 1:18-cv-00957-CMH-TCB

**JOINT MOTION FOR ENTRY OF
PROPOSED STIPULATED PROTECTIVE ORDER**

Pursuant to Local Civil Rule 7 and Federal Rule of Civil Procedure 26(c), Plaintiffs UMG Recordings, Inc., Capitol Records, LLC, Warner Records Inc., Atlantic Recording Corporation, Elektra Entertainment Group Inc., Fueled by Ramen LLC, Nonesuch Records Inc., Sony Music Entertainment, Sony Music Entertainment US Latin LLC, Arista Records LLC, LaFace Records LLC, and Zomba Recording LLC (collectively, “Plaintiffs”) and Defendant Tofig Kurbanov (“Defendant”) hereby jointly move this Court for entry of a Proposed Stipulated Protective Order. In support of their Joint Motion, the parties state as follows:

1. On April 22, 2021, the Court entered a Scheduling Order, allowing the parties to submit an agreed protective order concerning the disclosure of information between the parties in discovery. ECF No. 87, at 2.
2. A protective order is necessary to protect confidential, proprietary information that may be exchanged during the course of discovery.
3. The Proposed Stipulated Protective Order is attached to this Joint Motion as Exhibit A.

Respectfully submitted,

Dated April 27, 2021

/s/ Scott A. Zebrak

Scott A. Zebrak (VSB No. 38729)

Matthew J. Oppenheim (*pro hac vice*)

Lucy Grace D. Noyola (*pro hac vice*)

Kellyn M. Goler (*pro hac vice*)

OPPENHEIM + ZEBRAK, LLP

4530 Wisconsin Avenue, NW, 5th Floor

Washington, DC 20015

Tel: (202) 480-2999

Fax: (866) 766-1678

scott@oandzlaw.com

matt@oandzlaw.com

lucy@oandzlaw.com

kellyn@oandzlaw.com

Attorneys for Plaintiffs

/s/ Jeffrey H. Geiger

Jeffrey H. Geiger (VSB No. 40163)
SANDS ANDERSON PC
1111 E. Main Street, Suite 2400
Bank of America Plaza
P.O. Box 1998 (23218)
Richmond, Virginia 23218-1998
Telephone: (804) 783-7248
jgeiger@sandsanderson.com

/s/ Valentin D. Gurvits

Valentin D. Gurvits (*pro hac vice*)
BOSTON LAW GROUP, PC
825 Beacon Street, Suite 20
Newton Centre, Massachusetts 02459
Telephone: 617-928-1804
vgurvits@bostonlawgroup.com

/s/ Evan Fray-Witzer

Evan Fray-Witzer (*pro hac vice*)
CIAMPA FRAY-WITZER, LLP
20 Park Plaza, Suite 505
Boston, Massachusetts 02116
Telephone: 617-426-0000
Evan@CFWLegal.com

/s/ Matthew Shayefar

Matthew Shayefar (*pro hac vice*)
Law Office of Matthew Shayefar, PC
925 N La Brea Ave
West Hollywood, California 90038
Telephone: 323-948-8101
matt@shayefar.com

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on April 27, 2021, I electronically filed the foregoing with the Clerk using the CM/ECF system, which will send the document and notification of such filing to counsel of record.

/s/ Scott A. Zebrak
Scott A. Zebrak